

EMULSION POLYMERS COUNCIL, INC.

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February 6, 2009

Dr. Barbara Shane
Executive Secretary for the NTP BSC
NTP Office of Liaison, Policy & Review
National Institute of Environmental Health Sciences
P.O. Box 12233 – MD A3-01
Research Triangle Park, NC 27709

RE: National Toxicology Program (NTP) – 12th Report on Carcinogens (RoC):
Review of Styrene (CAS 100-42-5)

Dear Dr. Shane:

The Emulsion Polymers Council (EPC) is pleased to submit the attached comments to the NTP Board of Scientific Counselors for its review of styrene in regards the 12th RoC (73 FR 78364; December 22, 2008). EPC represents the major North American manufacturers of emulsion polymers. Its mission is to monitor and address regulatory as well as environmental health & safety issues of relevance to emulsion polymers, which are high molecular weight molecules (polymers) dispersed in water. Emulsion polymers are critical components in numerous coatings, paper and board products, adhesives and other consumer products.

The attached comments address significant concerns that have been identified with NTP's review of the animal carcinogenicity studies on styrene and the conclusions NTP is drawing from these studies. Please do not hesitate to contact me if you have any questions regarding these comments.

Sincerely,


Redacted

Andrew M. Jaques,
Senior Executive